

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

Brandon Tyler Allison,

Defendant.

Case: 2:21-cr-20559

Judge: Berg, Terrence G.

MJ: Stafford, Elizabeth A.

Filed: 08-31-2021 At 02:43 PM

INDI USA VS SEALED MATTER (DP)

Violations:

18 U.S.C. §§ 2251(a) and (e)

18 U.S.C. § 2422(b)

18 U.S.C. § 1470

18 U.S.C. § 2252A(a)(2)

18 U.S.C. § 2252A(a)(5)(B)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. §§ 2251(a) and (e)

Attempted Sexual Exploitation of Children

On or about June 24, 2019, in the Eastern District of Michigan, the defendant, BRANDON TYLER ALLISON, knowingly attempted to employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct; knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any

means, including by computer; and the visual depiction was transported using any means and facility of interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

18 U.S.C. § 2422(b)

Attempted Coercion and Enticement of a Minor

On or about June 24, 2019, in the Eastern District of Michigan, the defendant, BRANDON TYLER ALLISON, using any facility and means of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in sexual activity for which any person can be charged with a criminal offense, to include the production of child pornography described in 18 U.S.C. § 2256(8) and child sexually abusive activity or material, in violation of M.C.L. § 750.154c, all in violation of Title 18, United States Code, Section 2422(b).

COUNT THREE

18 U.S.C. § 1470

Transfer of Obscene Materials to Minors

On or about September 29, 2019, in the Eastern District of Michigan, the defendant, BRANDON TYLER ALLISON, did, by means of interstate commerce, knowingly and unlawfully transfer obscene matter to another individual who had

not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years, in violation of Title 18, United States Code, Section 1470.

COUNT FOUR

18 U.S.C. § 2252A(a)(2)
Distribution of Child Pornography

From on or about June 24, 2019, to October 29, 2019, in the Eastern District of Michigan, the defendant, BRANDON TYLER ALLISON, did knowingly and unlawfully distribute material that contained child pornography, as defined in 18 U.S.C. § 2256(8); and the images were distributed by the defendant using the Internet, a means and facility of interstate and foreign commerce, and had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT FIVE

18 U.S.C. § 2252A(a)(5)(B)
Possession of Child Pornography

On or about April 15, 2021, in the Eastern District of Michigan, the defendant, BRANDON TYLER ALLISON, did knowingly and unlawfully possess one or more computer hard drives, cell phones, cameras, DVDs, magazines, periodicals, and other material which contained child pornography, as defined in 18 U.S.C. § 2256(8), including but not limited to visual depictions of real minors,

prepubescent minors, and minors who had not yet attained 12 years of age, engaged in sexually explicit conduct, that had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting foreign commerce by any means, including by computer, and that had been produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATIONS

**18 U.S.C. § 1467, 18 U.S.C. § 2253, 18 U.S.C. § 2428
18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461**

The allegations contained in Counts One through Five of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. §§ 1467, 2253, and 2428; and 18 U.S.C. § 981(a)(1)(C) together with 28 U.S.C. § 2461.

Pursuant to 18 U.S.C. § 2253(a), upon conviction of the offenses alleged in Counts One, Four, or Five of the Indictment, the defendant shall forfeit to the United States:

- any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of this chapter;

- any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Upon conviction of the offenses alleged in Count Two of the Indictment, the defendant shall forfeit to the United States:

- any property, real or personal, which constitutes or is derived from proceeds traceable to the violation of the offense pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461; and
- the defendant's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the violation, pursuant to 18 U.S.C. § 2428.

Pursuant to 18 U.S.C. § 1467, upon conviction of the offenses alleged in Count Three of the Indictment, the defendant shall forfeit to the United States:

- any obscene material produced, transported, mailed, shipped, or received in violation of the offense;
- any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and
- any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

Substitute Assets. Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b), the defendant shall forfeit substitute property, up to the value of the property described above, if, by any act or omission of the defendant, the property described above cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the

jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

THIS IS A TRUE BILL

s/ Grand Jury Foreperson

GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

s/ Benjamin Coats

BENJAMIN COATS
Chief, Major Crimes Unit

s/ Erin Ramamurthy

ERIN RAMAMURTHY
Assistant United States Attorney

Dated: August 31, 2021

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number:
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: FLR

Case Title: USA v. Brandon Allison

County where offense occurred: Jackson

Offense Type: Felony

Indictment -- no prior complaint

Superseding Case Information

Superseding to Case No: _____ Judge: _____

Reason:


Defendant Name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

August 31, 2021
Date


Erin Ramamurthy
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.